

MEMO ENDORSED

Granted.

Date: 2/11/2022



SO ORDERED

KENNETH M. KARAS U.S.D.J.

STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

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February 11, 2022

Via ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Culbreath v. Griffin, 17 Civ. 3406 (KMK)(LSM)

Dear Judge Karas:

This Office represents defendant Michael Nagy in the above-captioned action. We write pursuant to Section IX of Your Honor's Individual Rules, the Southern District of New York's Sealed Records Filing Instructions, and Sections 14 and 15 of the Stipulation of Confidentiality and Protective Order ("Protective Order") entered by this Court on September 4, 2018 (Dkt No. 62), to respectfully request leave to file under seal certain content in the exhibits attached to the Attorney Declaration to the Memorandum of Law in Support of Defendant's Motion in Limine. The basis for this request is that the documents and material reference highly sensitive information and the names of third parties, disclosure of which could jeopardize institutional security and personnel safety if placed in the public realm. The information is based on documents that were designated either Confidential or Attorney's Eyes Only under the Protective Order. A similar request was granted on April 5, 2021. (Dkt. No. 196).

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Ian Ramage

Assistant Attorney General

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cc: Plaintiff's counsels, via ECF